

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 2646 & 2748

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On September 19, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ Motion for Entry of an Order (I) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (II) Granting Related Relief* [D.I. 2646] (the “Motion”).²
2. On September 29, 2023, the Office of the United States Trustee (the “U.S. Trustee”) filed the *United States Trustee’s Objection to Debtors’ Motion for Entry of an Order (I) Granting Leave from Local Rule 3007-1(f) to Permit the Filing of Substantive Omnibus Objections and (II) Granting Related Relief* [D.I. 2748].
3. On October 19, 2023, the Debtors filed a reply in further support of the Motion.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

4. On October 24, 2023 the Court held a hearing (the “Hearing”) to consider, among other things, the Motion.

5. The Debtors have revised the proposed order (the “Revised Order”) consistent with the Court’s ruling on the Motion at the Hearing, a copy of which is attached hereto as Exhibit A. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as Exhibit B.

6. The Revised Order has been circulated to the U.S. Trustee. Counsel for the U.S. Trustee has reviewed the Revised Order and believes that it is consistent with the Court’s ruling on the Motion at the Hearing. The Revised Order also has been circulated to the Official Committee of Unsecured Creditors appointed in these chapter 11 cases (the “Committee”) and the Ad Hoc Committee of Non-US Customers of FTX.com (the “Ad Hoc Committee,” and together with the Committee, the “Committees”). The Committees have reviewed the Revised Order and believe the Revised Order is consistent with the Court’s ruling on the Motion at the Hearing and have no objection to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: October 31, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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